
From: Keith Lipscomb
Sent: Friday, February 01, 2013 1:50 PM
To: Urey, Giancarlo
Cc: copyright
Subject: RE: Bellwether Trial Deposition Subpoena to Verizon -- General Motion to Compel

Giancarlo,

This confirms our conversation of earlier today. In that conversation, we talked about the Bellwether and the Motion to Compel pending in TX. As to the Bellwether, I advised that I needed:

- (a) To lay the foundation for the introduction of the correlation of IP Address to subscriber for purposes of use at trial;
- (b) Information about the reliability of Verizon's correlating technique;
- (c) DMCA notices and if applicable 6 strike notices sent to the applicable subscribers;
- (d) Bandwidth usage;
- (e) Products viewed to the extent they match what's on our BitTorrent cross reference report.
- (f)

I further advised that in future cases, I thought I may be able to just send a written interrogatory asking Verizon to confirm that nothing material has changed, and then if Verizon was more than 100 miles from the court house or ignored the subpoena I could read the depo testimony into evidence.